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**Certified Mail
Return Receipt Requested**

Thomas J. Krueger
Associate Regional Counsel
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77 West Jackson Boulevard (C-14J)
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EPA Region 5 Records Ctr.



368445

**Re: Ellsworth Industrial Park
Downers Grove, Illinois**

Dear Mr. Krueger:

On behalf of the Precision Brand Products, we are providing this individual response to your letter of June 12, 2006 which requested additional documentation available to the settling parties. This submittal is supplemental to the general response previously provided on behalf of all settling parties, and incorporates by reference all of the responses submitted and yet to be submitted by individual parties (including without limitation the documents accompanying the prior submittal by Rexnord).

Without limitation or waiver of any potential objections that the other settling parties may have individually or in the aggregate, enclosed please find a CD that includes the depositions of ex-employees of Precision or DuPage Manufacturing taken in the Muniz class action, and interrogatory responses provided by Precision to various parties in that action. An index is also enclosed.

If you have any questions, feel free to call.

Yours truly

Bruce White

Enclosures

cc: w/o enclosures

Mazin Enwiya, RPM

No.	Date	Case	Description
1	06/30/04	Muniz	Precision Brand Products, Inc.'s Objections to "Plaintiffs' Interrogatories to Defendant Precision Brand Products, Inc." and "Plaintiffs' First Request For Production to Defendant Precision Brand Products, Inc."
2	03/24/05	Muniz	Defendant Precision Brand Products, Inc.'s Responses to Plaintiffs' Interrogatories and to Plaintiffs' First Request For Production to Defendant Precision Brand Products, Inc.
3	10/24/05	Muniz	Warren Shrader's Deposition (DuPage Manufacturing)
4	11/03/05	Muniz	Chester Bailey's Deposition (DuPage Manufacturing)
5	11/03/05	Muniz	Gordon Hoppestad's Deposition (Precision Brand Products)
6	11/04/05	Muniz	Wesley Anderson's Deposition (DuPage Manufacturing)
7	11/17/05	Muniz	Mary Rita Torrez's Deposition (DuPage Manufacturing)
8	01/18/06	Muniz	Maurice Heiberger's Deposition (DuPage Manufacturing)
9	04/17/06	Muniz	Defendant/Third-Party Plaintiff Precision Brand Products, Inc.'s Objections to Interrogatory of Defendant/Third-Party Plaintiff RHI Holdings, Inc. and The Fairchild Corporation
10	04/17/06	Muniz	Defendant/Third-Party Plaintiff Precision Brand Products, Inc.'s Objections to First Set of Interrogatories of Defendant/Third-Party Plaintiff Lovejoy, Inc.
11	04/17/06	Muniz	Defendant/Third-Party Plaintiff Precision Brand Products, Inc.'s Objections to and Responses to Discovery Requests of Defendant/Third-Party Plaintiff Arrow Gear Company
12	03/28/06	Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to Bison Gear & Engineering Corporation's First Set of Interrogatories to Third-Party Plaintiffs
13	03/28/06	Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to Defendant Scot, Incorporated's First Set of Interrogatories to Defendants and Third-Party Defendants
14	03/28/06	Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to RHI Holdings, Inc.'s First Set of Interrogatories to Third-Party Plaintiffs
15	06/28/06	Bendik/ Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Response to Third Party Defendant Downers Grove Sanitary District's First Set of Interrogatories and Requests for Production of Documents to All Third-Party Plaintiffs
16	06/28/06	Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to The Morey Corporation's First Set of Interrogatories to Third-Party Plaintiffs and Third-Party Defendants
17	06/28/06	Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to Defendant Lindy Manufacturing Company's First Set of Interrogatories to Defendants, Third-Party and Fourth-Party Defendants
18	06/28/06	Bendik	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to Third-Party Defendant Lindy Manufacturing Company's First Set of Interrogatories to Third-Party Plaintiffs
19	06/28/06	Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to Third-Party Defendant Magnetrol International, Inc.'s First Set of Interrogatories to Third-Party Plaintiffs

No.	Date	Case	Description
19	03/28/06	Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to Lovejoy's Interrogatories to Defendants and Third-Party Defendants
20	06/28/06	Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to Third-Party Defendant Chase-Belmont Properties' Interrogatories and Requests for Production of Documents to Third-Party Plaintiffs
21	06/28/06	Bendik	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Response to Third-Party Defendant Arrow Gear Company's First Set of Interrogatories and Document Production Requests to Third-Party Plaintiffs
22	06/28/06	Pote	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to William Helwig and Downers Grove Bank as Trustee Under Trust 85-77's Interrogatories to Third-Party Plaintiffs and Third-Party Defendants
23	06/23/06	Bendik	Defendants/Third-Party Plaintiffs Precision Brand Products, Inc.'s and Precision Steel Warehouse, Inc.'s Answer to Third-Party Defendant Tricon Industries, Inc.'s First Set of Interrogatories to Third-Party Plaintiffs